

Declaration of principle on respect for human rights

Our commitment to respecting human rights

We are aware of our corporate responsibility to respect human rights.

We are therefore committed to respecting human rights in our own business activities and in our global supply and value chains and to providing access to remedy for those affected by human rights violations. In doing so, we align our business activities with the internationally recognized United Nations Guiding Principles on Business and Human Rights and thus implement the requirements of the Supply Chain Due Diligence Act.

In addition, our understanding and our human rights due diligence processes are based on the following international human rights reference instruments, to which we are committed:

- The International Bill of Human Rights, i.e. the United Nations Universal Declaration of Human Rights as well as the Civil and Social Covenants, which define civil, political and social rights to which all people are entitled for the sake of their dignity.
- The core labor standards of the International Labor Organization (ILO) with their four basic principles on freedom of association and the right to collective bargaining, the elimination of forced labor and child labor, and the prohibition of discrimination in respect of employment and occupation.

We expect our business partners to also commit to respecting human rights, to establishing appropriate due diligence processes and to passing these expectations on to their own suppliers.

Relevant human rights issues and potentially affected groups of people

We recognize that our business activities and our global supply and value chains have the potential to cause adverse impacts on human rights.

We are committed to respecting all nationally and internationally recognized human rights and focus our human rights due diligence processes in particular on the following human rights issues, which we have identified as material for our company through a risk analysis. We believe that these topics pose the greatest risks of adverse impacts on people that are directly or indirectly related to our business activities at our locations and in our global supply and value chains:

- Forced labor
- Restrictions on freedom of assembly and association
- Damage to health, the roof or economic assets required for subsistence, for example through water, soil or air pollution or deforestation.

In our efforts to respect human rights, we focus on the following groups of people, as their human rights are potentially jeopardized by business activities along our global supply and value chains:

- Groups of people in our direct and indirect supply chain: Employees in raw material production and raw material processing.

Our approach to implementing human rights due diligence obligations

For us, respect for human rights is a continuous process. The implementation of human rights due diligence in line with changing contextual conditions, the type of business activity and the size and structure of the company is constantly reviewed and continuously developed. We have therefore anchored human rights due diligence processes as an integral part of our organization and in our relationships with our business partners.

Risk analysis

We consider it part of our duty of care to be aware of potential and actual adverse human rights risks and impacts of our business activities on people along the entire value chain. We therefore use an established management process to identify and assess the relevant human rights issues and those potentially affected by our business activities as well as our direct and indirect business relationships. This includes analyzing both human rights risks and the impact of using our products and services.

To this aim, we have systematically added human rights and environmental issues to our company-wide risk and supplier management system. In our management process, we also take into account human rights and environmental criticism from third parties and reported incidents. The analysis of human rights and environmental risks and impacts is updated annually and whenever there are significant changes to the company's profile or business activities. To this end, we consult internal and external human rights and environmental data sources.

The results of the analysis of human rights risks and impacts are incorporated into our corporate decision-making processes with regard to supplier selection, business partner management, product responsibility and development as well as mergers and acquisitions. The risk analysis forms the basis for identifying appropriate measures. The Executive Board regularly discusses human rights conflicts of interest and relevant findings from our human rights due diligence processes. In addition, we use the results as a basis for creating and, where necessary, adapting internal regulations, processes and training in order to meet the changing requirements of our due diligence processes.

Measures

In order to fulfill our responsibility to respect human rights, we rely on a combination of different measures. The aim is to protect the (potentially) affected people and to prevent or at least minimize adverse human rights impacts on them. We have established standardized processes for this purpose.

In our own business area, we require our own employees to comply with and respect human rights via our Code of Conduct, and we also provide an anonymous complaints procedure. This enables complaints to be submitted in both digital and analog form.

Outside our company, we contractually oblige all of our direct business partners to comply with at least the laws applicable in the respective country and the core labor standards of the ILO, to respect human rights and to address human rights-related risks appropriately with their own business partners.

Effectiveness control

We review the effectiveness of our measures to prevent and minimize negative impacts on human rights at least once a year and on an ad hoc basis. We also check whether our requirements are being met. We check the effectiveness of measures in our value chain by monitoring the results of our continuous analysis of human rights risks and impacts.

Complaints management

We reject all forms of human rights violations. Appropriate and effective complaints management is therefore an important part of our due diligence processes in order to effectively prevent potential adverse human rights impacts caused by our company and our business activities and to provide effective remedies. We operate a whistleblower system that provides a confidential communication channel for internal and external stakeholders and all potentially affected parties worldwide to report possible violations of human rights and international treaties. Opportunities to access the whistleblower system are communicated proactively and in appropriate language to these groups in order to take account of differences in the target groups.

Our company has established a comprehensive whistleblower system to ensure that all employees and stakeholders can raise their concerns and complaints safely and confidentially. The Ombudsman plays a central role in this process and is responsible for maintaining the confidentiality of complainants' identities and ensuring an independent investigation of complaints. The ombudsman documents all complaints received and ensures that they are dealt with promptly and fairly. Regular reports on the ombudsman's activities are submitted to the management and the effectiveness of the complaints procedure is continuously reviewed and improved.

As far as possible and within our sphere of influence, we ensure that whistleblowers are protected from discrimination and punishment in connection with the complaints they submit. Our systematic handling of complaints and the knowledge gained from them enables us to continuously improve our human rights due diligence processes.

Remedial measures

In the event that we as a company have directly caused a violation of human rights, we work quickly to prevent the business activities that caused this or to make them compliant with human rights and work towards redress. If our employees behave in a way that is incompatible with human rights, appropriate sanctions are introduced. In the event that we contribute to potential or actual human rights violations through our business activities or are indirectly associated with them, we endeavor to contribute to appropriate remediation and prompt redress by the responsible parties. If we have a well-founded suspicion or concrete indication of possible human rights violations in our company or along our upstream and downstream value chain, we investigate this carefully and consistently. We oblige our business partners to support us in clarifying the facts and to cooperate fully within a reasonable timeframe. Depending on the severity of the violation, we reserve the right to respond appropriately to our business partners,

from requesting that the violation be remedied immediately to taking legal action and terminating the business relationship. Irrespective of this, we will work towards remedying the breach.

The process for identifying and assessing breaches of compliance is systematic and transparent. Once a breach has been identified, we develop suitable remedial measures in collaboration with the affected parties and implement them promptly. The effectiveness of these measures is continuously monitored and regularly documented in our reports.

Reporting

In our annual report, we inform the public about our human rights commitments and due diligence processes and their effectiveness. To this end, we report on the material human rights risks and impacts we have identified as a result of business activities along our global supply and value chains and describe the preventive and remedial measures we have implemented. To show how effective our human rights due diligence processes are, we also publish the key figures we use to measure their effectiveness.

Responsibilities for human rights due diligence in our company

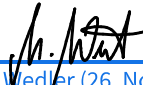
We have defined clear responsibilities for the exercise of and compliance with our human rights due diligence obligations. At the highest management level, our Executive Board is responsible for respecting human rights in our business activities as well as in the upstream and downstream value chain. Regular and ad hoc internal reporting to this level on the results of our continuous risk analysis relevant to human rights, information from our complaints mechanisms and information on the effectiveness of our remedial and preventive measures and complaints procedures ensures that informed decisions can always be made. The purchasing department is responsible for the operational implementation of our human rights due diligence processes along the supply chain.

Training courses

In order to sensitize all our employees to respect human rights and to impart the necessary expertise for the effective implementation of human rights due diligence processes in the relevant business areas, we carry out regular, mandatory training and further education measures in the form of training courses within our company.

Dealing with conflictual raw materials

In particular, we are committed to ensuring that minerals from conflict and high-risk areas and all high-risk minerals used in our products are procured in a human rights-responsible manner in accordance with the OECD Due Diligence Guidance for the so-called 3TG raw materials (tin, tantalum, tungsten and gold) as well as mica and cobalt.

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Mario Wedler (26. November 2024 08:00 GMT+1)

Mario Wedler
CHRO

X *Oliver Makko*

Oliver Makko
CFO

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Sven Bauer
CEO